

KAREN L. LOEFFLER
United States Attorney

STEPHANIE C. COURTER
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-1500
Email: Stephanie.Courter@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,)
) <u>COUNT 1:</u>
vs.) CONSPIRACY TO DISTRIBUTE
) AND POSSESS WITH THE INTENT
) TO DISTRIBUTE CONTROLLED
OMAR ALEJANDRO ALFARO,) SUBSTANCES
JOSE RAMON CANALES, and) Vio. of 21 U.S.C. §§ 846, 841(a)(1)
GENARO GUTIERREZ-REYES) and (b)(1)(A)
)
Defendants.) <u>COUNT 2:</u>
) INTERNATIONAL MONEY
) LAUNDERING CONSPIRACY
) Vio. of 18 U.S.C. § 1956(h)
)

I N D I C T M E N T

The Grand Jury charges that:

COUNT 1:

1. Beginning on a date uncertain, but by at least in or about January 2013 and continuing until on or about the date of this Indictment, both dates being approximate and inclusive, within the District of Alaska, the Western District of Texas, and elsewhere, the defendants, OMAR ALEJANDRO ALFARO and JOSE RAMON CANALES, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and with others both known and unknown to the Grand Jury, to distribute and possess with the intent to distribute controlled substances, to wit:

- a) One kilogram or more of a mixture or substance containing a detectable amount of heroin; and
- b) 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine,

in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

METHOD AND MEANS:

2. Defendants agreed to participate in, and participated in, a scheme to transport illegal controlled substances from Mexico into the United States. The defendants then arranged to sell the drugs to an Anchorage, Alaska-based co-conspirator for distribution in Alaska.

3. It was part of the conspiracy that each individual fulfilled particular roles. Specifically, the roles were as follows:

- a) Co-conspirator A worked as a large-scale drug distributor in Anchorage, Alaska.
- b) Co-conspirator B, who was located in Mexico, coordinated the distribution activities of conspirators and made arrangements for the consummation of drug deals.
- c) Defendant OMAR ALEJANDRO ALFARO delivered large quantities of drugs to co-conspirator A and others. ALFARO delivered the drugs at the direction of and in coordination with co-conspirator B.
- d) Defendant JOSE RAMON CANALES coordinated with co-conspirator B for the shipment of drugs to Anchorage, Alaska. CANALES also received cash payments for the purchase of drugs. CANALES then arranged to transport and, in some cases, actually transported the funds from the United States into Mexico.

OVERT ACTS

4. In furtherance of the conspiracy, and to effect the objects thereof, the defendants, together with other persons known and unknown to the Grand

Jury, performed and caused to be performed certain overt acts within the District of Alaska, the Western District of Texas, and elsewhere. These acts include, but are not limited to, the following:

OA1. Between January 2013 and May 2013, co-conspirator A traveled from Anchorage, Alaska to El Paso, Texas to purchase heroin.

OA2. Sometime prior to July 3, 2013, co-conspirator A traveled from Anchorage, Alaska to El Paso, Texas, where, over the course of one or more trips, he/she purchased approximately six kilograms of heroin through co-conspirator B.

OA3. Sometime prior to July 3, 2013, in El Paso, Texas, defendant OMAR ALEJANDRO ALFARO delivered heroin to co-conspirator A, who then sent it to Anchorage, Alaska and placed it in a storage unit for future distribution.

OA4. On or about October 7, 2013, co-conspirator A shipped approximately \$70,000 in cash from Anchorage, Alaska to defendant JOSE RAMON CANALES' address in El Paso, Texas to purchase approximately three kilograms of heroin.

OA5. On or about October 15, 2013, co-conspirator B arranged to ship approximately three kilograms of heroin from El Paso, Texas to Anchorage, Alaska in a package bearing defendant JOSE RAMON CANALES' address.

Co-conspirator A, in Anchorage, then placed the heroin in a local storage unit for future distribution.

OA6. On or about March 3, 2014, in El Paso, Texas, defendant OMAR ALEJANDRO ALFARO distributed approximately one kilogram of heroin to an Alaska undercover agent.

OA7. On or about March 20, 2014, in El Paso, Texas, defendant JOSE RAMON CANALES received a package containing \$28,000, which was payment for the approximately one kilogram of heroin distributed on or about March 3, 2014. CANALES then drove the funds across the border into Mexico.

OA8. On or about June 10, 2014, in El Paso, Texas, defendant OMAR ALEJANDRO ALFARO distributed approximately two kilograms of heroin and two pounds of methamphetamine to an Alaska undercover agent.

All of which is in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(A).

COUNT 2:

6. Beginning on a date uncertain, but by at least on or about October 2013 and continuing until on or about the date of this Indictment, both dates being approximate and inclusive, within the District of Alaska, the Western

District of Texas, the Eastern District of California, and elsewhere, the defendants, JOSE RAMON CANALES and GENARO GUTIERREZ-REYES, along with others both known and unknown to the Grand Jury did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other to commit certain offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit, to transport, transmit, and transfer monetary instruments and funds from a place in the United States to or through a place outside the United States,

- a) With the intent to promote the carrying on of a specified unlawful activity, that is, conspiracy to distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846; and
- b) Knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, and the control of the proceeds of a specified unlawful activity, that is, conspiracy to distribute and

possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(a)(2)(B)(i).

All of which is in violation of Title 18, United States Code, Section 1956(h).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Stephanie C. Courter
STEPHANIE C. COURTER
United States of America
Assistant U.S. Attorney

s/ Karen L. Loeffler
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: 10/21/14